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Kathryn Marie Krause
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February 27, 2001

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Portals II
Room TW-A325
445 12th Street, S.W.
Washington, DC 20554

Re: 2000 Biennial Regulatory Review, Telecommunications Service Quality
Reporting Requirements, CC Docket No. 00-229
February 16, 2001 Reply Comments of Qwest Corporation, **Correction**

Dear Ms. Roman Salas:

In connection with the Reply Comments of Qwest Corporation ("Qwest") in the above-referenced proceeding (said Reply Comments having been filed electronically on February 16, 2001 *via* the Federal Communications Commission's ("Commission") Electronic Comment Filing System), please see that this letter is incorporated in the record of this proceeding.

On page 2 of the above-referenced Reply Comments, Qwest made the statement that "Others, including small and rural LECs as well as CLECs and their representatives, argued that some or all of the existing ARMIS reporting requirements should be maintained for [incumbent local exchange carriers] ILECs but not extended to them." Counsel for certain of the small and rural ILECs referenced by Qwest has objected to this sentence, and Qwest's references to her clients ((the Rural Local Exchange Carriers or "Rural LECs") and Bluestem Telephone Company, *et al.* ("Bluestem")), on the grounds that the filing she prepared on behalf of these clients contains a footnote expressly stating that "no position" was being taken with respect to the imposition of the ARMIS requirements on the large ILECs.

Such a footnote was incorporated into the filing for the Rural LECs and Bluestem, somewhat far into the filings.¹ Prior to reaching that footnote, however, both documents are replete with references as to how the Commission should not impose ARMIS service quality reporting requirements on small and rural LECs. Since those obligations are currently in place with respect to large LECs, the fact that no reference was made to this current imposition early in the comments of the Rural LECs and Bluestem suggested to Qwest's reviewing counsel that

¹ On page 17, note 37 of the Rural LECs' filing and on page 15, note 37 of the Bluestem filing, there is a statement that the commenting party is "not taking a position on whether service quality reporting should be imposed on larger [local exchange carriers] LECs if it is not imposed on small LECs."

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counsel for the Rural LECs and Bluestem was satisfied with the *status quo* but did not want ARMIS service quality reporting obligations extended.²

Qwest regrets any inconvenience this clarification has for the Commission or its staff but did want to point out the existence of the footnote that the Rural LECs' and Bluestem's counsel had included in the filed comments and Qwest's failure to explicitly refer to it or reflect its content in our advocacy.

Qwest is also serving (as is indicated on the enclosed Service List) a hard copy of this letter on all of the recipients of the Reply Comments filed on February 16th.

If you have any questions regarding this information, please call me.

Sincerely,

Kathryn Marie Krause

² Comments filed on behalf of the Rural LECs and Bluestem began with statements such as (quoting from the filing submitted on behalf of the Rural LECs), "The Rural LECs request the Commission to refrain from imposing the ARMIS service quality reporting requirements on small local exchange carriers (LECs)" (page 1) and "Because there is no evidence of widespread performance problems for small LECs, there is no need to require them to engage in this burdensome process. The Commission's goal of minimizing reporting requirements for all LECs, and for small LECs in particular, mandates that the Commission refrain from extending the ARMIS service quality reporting requirements to include small LECs" (pages 1-2). Similar statements are found in the Bluestem filing. Furthermore, both filings are entirely focused on how the Commission should not impose ARMIS service quality reporting requirements on small and rural LECs.

CERTIFICATE OF SERVICE

I, Richard Grozier, do hereby certify that I have caused 1) the foregoing **LETTER** to be filed electronically with the FCC by using its Electronic Comment Filing System, 2) a copy of the **LETTER** to be served, via First Class United States Mail, postage prepaid, upon the persons/entity listed on the attached service list.*

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February 27, 2001

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